

FILED

STATE OF INDIANA

FEB 25 2000

INDIANA UTILITY REGULATORY COMMISSION

IN THE MATTER OF THE PETITION OF INDIANA)
BELL TELEPHONE COMPANY, INCORPORATED,)
D/B/A AMERITECH INDIANA PURSUANT TO)
I.C. 8-1-2-61 FOR A THREE-PHASE PROCESS FOR) CAUSE NO. 41657
COMMISSION REVIEW OF VARIOUS)
SUBMISSIONS OF AMERITECH INDIANA TO)
SHOW COMPLIANCE WITH SECTION 271(C) OF)
THE TELECOMMUNICATIONS ACT OF 1996.)

INDIANA UTILITY REGULATORY COMMISSION

PETITION TO INTERVENE

AT&T Communications of Indiana, Inc. ("AT&T") and its affiliate,
TCG Indianapolis ("TCG"), by counsel, respectfully petition to intervene in this proceeding, and
in support thereof state that:

1. On February 2, 2000, Indiana Bell Telephone Company, Incorporated,
d/b/a Ameritech Indiana ("Ameritech Indiana") filed its Petition initiating this proceeding,
requesting that the Indiana Utility Regulatory Commission ("Commission") investigate and
review in this proceeding the various submissions of Ameritech Indiana showing compliance
with Section 271(c) of the Telecommunications Act of 1996 ("TA-96") in order to allow the
Commission to consult with the Federal Communications Commission ("FCC") on Ameritech
Indiana's compliance. Ameritech Indiana also requests that the Commission adopt the three-
phase approach for this proceeding described in Exhibit A to the Petition.

2. AT&T is an Indiana corporation whose business address is One North
Capitol, Suite 1100, Indianapolis, Indiana 46204. AT&T is a "public utility" and a "telephone
company" as those terms are defined in the Public Service Commission Act, Ind. Code § 8-1-2-1,
et seq.

3. AT&T is engaged in the business of providing telecommunications services to the public within the State of Indiana. It is authorized by the Commission's Orders in Cause Nos. 37347 (December 30, 1983) and 39084 (July 31, 1991) to offer both interLATA and intraLATA interexchange telecommunications services to the public within Indiana. It also is authorized by the Commission's Order in Cause No. 40415 (September 5, 1996) to provide local exchange services to the public throughout the State of Indiana on a bundled resale basis in accordance with the findings contained in that Order and the provisions of the following Orders issued in Cause No. 39983: (a) the July 1, 1996 Interim Order on Bundled Resale and Other Issues, (b) the December 18, 1996 Order on Reconsideration and Resale Issues and (c) the October 15, 1997 Order on Final Reconsideration and Further Directing That Interim Wholesale Tariffs Be Filed. AT&T also is authorized to provide local exchange services as a facilities-based provider to the public throughout Indiana in accordance with the provisions the Commission's Orders issued in Cause Nos. 40652 (May 8, 1997), 40881 (September 17, 1997) and 41077 (November 12, 1998 and June 2, 1999).

4. TCG is a New York general partnership whose business address is One North Capitol, Suite 1100, Indianapolis, Indiana 46204. TCG is a "public utility" and a "telephone company" as those terms are defined in the Public Service Commission Act, Ind. Code § 8-1-2-1, et seq.

5. TCG is engaged in the business of providing telecommunications services to the public within the State of Indiana. It is authorized by the Commission's Order issued in Cause No. 40232 on October 18, 1995, to provide interLATA and intraLATA private line telecommunications service to the public within the State of Indiana. It was authorized by the

Commission's Orders issued in Cause No. 40478 on January 23, 1997, and March 5, 1997, to offer and furnish local telephone exchange services, including intraLATA toll services, and switched and dedicated access services to the public throughout those portions of central Indiana described as Indiana Bell Telephone Indianapolis LATA served by Ameritech Indiana. By Order issued in Cause No. 41113 on April 22, 1998, the Commission authorized TCG to offer and furnish local telephone exchange services, including intraLATA toll and switched and special access services, as a facilities-based provider on a state wide basis. TCG also is authorized to provide facilities-based and/or resold intrastate interexchange services pursuant to the Order issued by the Commission on July 30, 1997, in Cause No. 40760.

6. AT&T and TCG have a substantial interest in the matters to be considered in this Cause. In order to establish compliance with Section 271(c) of TA-96, Ameritech Indiana must show that it has opened the local exchange market to effective competition by others, especially competitive local exchange companies ("CLECs"), such as AT&T and TCG. Thus, as CLECs, AT&T and TCG are in a position to provide the Commission with specific information regarding the steps Ameritech Indiana has taken to comply with the "checklist" items and the effect of such actions. AT&T has been an active participant in the prior proceedings before the Commission leading up to this Cause, including those cited in Ameritech Indiana's Petition, i.e., Cause Nos. 40641, 40509, and 41324. Ameritech Indiana says that in this Cause, it "seeks an open and efficient process" and "believes that an open exchange of questions and issues between all parties will allow for the best possible outcome in the shortest possible time." Exhibit A to Petition, pp. 3 and 20. AT&T and TCG are two of the parties best able to assist the Commission

in considering and acting upon the various submissions to be submitted by Ameritech Indiana in its efforts to show its compliance with Section 271(c) of TA-96.

7. AT&T and TCG understand and agree that they shall be bound by all stipulations, rulings and other matters of record prior to the time they are made parties to this proceeding and shall take this case as they find it as of the date they are made parties to this proceeding. AT&T's and TCG's intervention herein will not unduly broaden the issues involved in this proceeding, delay the schedule of activities in this proceeding, or unduly prejudice any party to this proceeding.

8. The names, addresses and telephone numbers of the attorneys for AT&T and TCG in this proceeding are:

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and

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AT&T and TCG respectfully request that the Commission and all parties to this Cause serve all notices, docket entries, orders, pleadings, prefiled testimony and exhibits, briefs, etc. by mail or

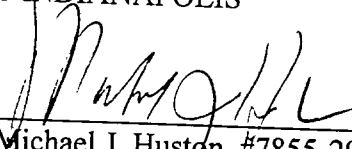
personal delivery upon both Mr. Trabaris and Mr. Huston, each of whom is authorized to receive copies of such materials.

WHEREFORE, AT&T and TCG respectfully request that the Commission allow them to intervene and be made parties to this proceeding.

Respectfully submitted,

AT&T COMMUNICATIONS OF INDIANA, INC.
TCG INDIANAPOLIS

By


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CERTIFICATE OF SERVICE

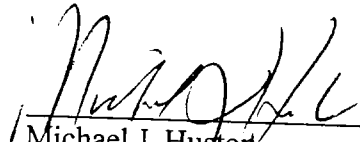
The undersigned certifies that on February 25, 2000, copies of the foregoing
Petition to Intervene were mailed by first class United States mail, postage prepaid, to:

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